

REMARKS

Applicants respectfully request reconsideration of the present U.S. Patent application. No claims have been added or cancelled. Claim 27 has been amended merely to correct lingering informalities. Thus, Claims 1-9, 16-19, and 25-35 are pending.

REJECTIONS UNDER 35 U.S.C. § 102(e)

Claims 1-7, 9, 16, 17, 19, 25-27, 29, 30, 32, 33, and 35 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,253,243 issued Spencer (*Spencer*). For at least the reasons set forth below, Applicants submit that claims 1-7, 9, 16, 17, 19, 25-27, 29, 30, 32, 33, and 35 are not anticipated by *Spencer*.

The Manual of Patent Examining Procedure ("MPEP"), in § 2131, states:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 869 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Thus, under 35 U.S.C. § 102, a claim is anticipated *only if* each and every element of the claim is found in the cited reference and the cited reference must show the invention in as complete detail as contained in the claim.

Amended claim 1 recites:

translating said reported alert events **to platform specific alert events** by said alert proxy, wherein translating includes using the obtained identifier to **reference an event description file**.

(Emphasis added). Independent claims 16, 25, 27 and 29 similarly recite "obtaining an identifier" and "translating ... wherein translating includes using the obtained identifier to

reference an event description file.” Independent claim 32 similarly recites, “comparing the assigned values to an event description file to determine platform specific alert information.”

Regarding those claim elements directed to translating, the Office action directs the Applicants’ attention to column 2, lines 18-65, column 2, lines 5-17, and column 9, lines 24-32, wherein *Spencer* discusses mapping SNMP traps to CMIP event notifications. For example, *Spencer* states:

SNMP traps generated by SNMP agents on the network are handled by a ... management system daemon called the “em_snmp-trap” daemon. This daemon is a separate UNIX process which listens on a predetermined network port for incoming SNMP traps which must be forwarded to management stations. The trap daemon forwards the traps to SNMP network managers. **The trap daemon also converts incoming SNMP traps to CMIP event notifications ...**

The SNMP trap daemon process 420 receives SNMP trap from network 416 by listening on a predetermined port (port 162). As will be discussed below, **these traps are either converted to CMIP events and forwarded to the MIS 404 or forwarded as “raw” SNMP traps to other managers** schematically represented by box 418.

See column 2, line 66 through column 3, line 7 and column 6, lines 50-55 (emphasis added). An SNMP trap is a protocol data unit used to monitor network events (e.g., system start-up and shut-down). Similarly, a CMIP event notification refers to a protocol data unit that is compliant with the CMIP standard. *Spencer* merely discloses receiving an SNMP compliant PDU and converting the PDU so that it is compliant with the CMIP protocol.

Spencer does not, however, disclose “**translating [the] reported alert events to platform specific alert events.**” Also, *Spencer* does not disclose an “**event description file.**” Thus, Applicants respectfully submit that *Spencer* does not disclose “**translating said reported alert events to platform specific alert events by said alert proxy, wherein translating includes using the obtained identifier to reference an event description file,**” as recited in claims 1, 16,

25, 27, 29, and 32. For at least the above-stated reasons, Applicants respectfully submit that *Spencer* does not anticipate independent claims 1, 16, 25, 27, 29 and 32.

Claims 2-7 and 9 depend from claim 1. Claims 17 and 19 depend from claim 16. Claim 26 depends from claim 25. Claim 30 depends from claim 29. Claims 33 and 35 depend from claim 32. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 2-7, 9, 17, 19, 26, 30, 33, and 35 are not anticipated by *Spencer*.

REJECTIONS UNDER 35 U.S.C. § 103(a)

Dependent claims 8, 18, 28, 31, and 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Spencer* in view of U.S. Patent No. 5,689,708 issued to Regnier, et al. (*Regnier*). Claim 8 depends from claim 1. Claim 18 depends from claim 16. Claim 28 depends from claim 27. Claim 31 depends from claim 29. Claim 34 depends from claim 32. For at least the reasons sets forth below, Applicants submit that claims 8, 18, 28, 31, and 34 are not rendered obvious by *Spencer* in view of *Regnier*.

Dependent claim 8 includes the limitations of claims 1 and 7 and further recites:

...wherein referencing said description data file comprises referencing a plain text "ini" file.

Dependent claim 18 similarly recites referencing a plain text "ini" file and includes the limitations of 16 and 17.

Dependent claim 28 and 34 recite:

...report[ing] a plain text description corresponding to the alert event.

Dependent claim 31 similarly recites "transform[ing] device-specific alert data into plain text explanations of the alert."

Regnier is cited as teaching that referencing the description data file comprises referencing a plain text "ini" file. Whether or not *Regnier* discloses the limitations cited by the Office action, it does not teach or suggest "translating [the] reported alert events to platform specific alert events," or an "event description file" as recited in claims 1, 16, 27, 29, and 32. Because neither *Spencer* nor *Regnier* teach or suggest the above-cited claim limitations, no combination of *Spencer* and *Regnier* teaches or suggests the invention as claimed in claims 8, 18, 28, 31, and 34. Thus, Applicants respectfully submit that dependent claims 8, 18, 28, 31, and 34 are not rendered obvious by *Spencer* in view of *Regnier*.

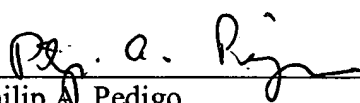
CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-9, 16-19, and 25-35 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,
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